

To: Rodriguez, Dante[Rodriguez.Dante@epa.gov]; Dave Davis (drdavis@blm.gov)[drdavis@blm.gov]; Seter, David[Seter.David@epa.gov]; Dirscherl, Christopher[Dirscherl.Christopher@epa.gov]
From: Jeryl Gardner
Sent: Mon 10/3/2016 6:54:50 PM
Subject: RE: NDEP-EPA/BLM monthly 10/3/16 - Dante's notes [WARNING: SPF validation failed]

Thanks, Dante.

Just a few additions/revisions to your notes below, captured in **green font** below.

Thanks for putting those together; very helpful!!!

Jeryl

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From: Rodriguez, Dante [mailto:Rodriguez.Dante@epa.gov]
Sent: Monday, October 3, 2016 11:30 AM
To: Jeryl Gardner; Dave Davis (drdavis@blm.gov); Seter, David; Dirscherl, Christopher
Subject: NDEP-EPA/BLM monthly 10/3/16 - Dante's notes

ANACONDA SUPERFUND SITE

MONTHLY STATUS MEETING: NDEP-EPA/BLM

DATE:

10/3/16

PARTICIPANTS: Dave Seter (EPA), Dante Rodriguez (EPA), Chris Dirscherl (EPA), Jeryl Gardner (NDEP), Dave Davis (BLM)

Notes from today's meeting in color.

Action items in red.

OU0. SITEWIDE:

- **NPL Listing –**

- Public notice ran in Reno and Yerington papers, email to stakeholders and postcards to public went out with instructions for commenting. Sarah will send to site file.

- ARC proposal submitted to governor for public-private solution to defer listing, NDEP discussing with ARC, maintaining confidentiality for now. NDEP plans to give EPA/BLM something in writing, meet with us, meet with us and ARC, evaluate whether it meets criteria for deferring listing, by Thanksgiving. EPA generally defers if party is conducting response action, or state actively pursuing agreement with capable capable party. EPA/BLM don't know any details about negotiations taking place between NDEP and ARC. No news about when EPA/BLM might see proposal, estimate before Thanksgiving, maybe end of October. ARC proposal is to fully fund provide for remedy completion for OU8 (not band-aid).

- Public comments, Eugenia said we can view them as they come in, has a few so far including Peggy and other neighbor. Eugenia will send listing stuff to records center. Nov 8 is last day of public comment period.

- SPS said, according to Greg, that EE will negate need for NPL listing. (see also EE in OU8 below)

- Tribal consultation – BLM and EPA sent consultation letters. BLM offered consultation to other tribes, Bridgeport tribe accepted offer, EPA not participating, Bridgeport requested site visit, Ralph arranging. Dante: 10/11 WRPT 2p, 10/12 YPT 5:30p, both Council meetings. YPT invited NDEP to attend consultation. BLM: Colleen Sievers, Asst District Manager of Carson District, and John Callan likely will attend for BLM (DaveD out 10/7-12). Angeles, Harry, Dante and Sarah will attend for EPA. Jeryl on leave 10/7-19.

- **Community Involvement –**

- CIP. CI workgroup met early September. Working on CIP draft, Dave and Sarah writing portions and contractor other parts, interview/contacts/etc. Dave is doing history section following format of Carson River. Internal draft for team review end of September. Sarah said

Ginny hasn't responded to her calls to discuss CIP interviews.

- o Webpage. New EPA webpage, Chris will forward link to group.

- o Repository. Jeryl said we should check to make sure it is complete, Yerington library. Sarah did stop in last time, it is still there.

- o Fact sheet. Will give OU updates, upcoming activities, NPL comment period if still timely, brief update on OU8 which will have its own fact sheet later, mainly OU4 and OU7 update, next couple months. Sarah said workgroup discussed roles and responsibilities, sent notes to team.

- **MOU** – 2-way MOU signed, 3-way signed. Jeryl noted that MOU didn't have any date on it. Effective date is last signature, BLM adding date and distributing. We hadn't sent to SRC yet.

- **TT SharePoint Site** – TT contact ending. TT dbase person said they can make backup copy of SP site on a flashdrive/portable hard drive and submit to us. ARC declined taking it on, we will have CBI do it. Dante has miscellaneous CI task, will check and talk to Maria.

- Next ARC call, Jeryl will **propose** move to week of 10/17.

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OU1. Groundwater:

- **Remedial Investigation** –

- o Background. ARC background document, received Acree/Ford comments, had call with Acree/Ford. Dave sent comment letter telling ARC what is needed, request ARC revise/resubmit within 45 days, specify wells to include in background set. Dave: 45 day turn around requested for addressing comments on background, sent comments last week, due about 11/14. Jeryl: what about addressing in RI? Dave: previous version didn't do it right, enough aquifer layers, not enough confidence in ARC, review revision and consult with Acree (**via phone call**) as needed. Haven't heard back from ARC yet about comments. Jeryl thought comments were all reasonable.

- o Geochemistry. Dave provided some "like to have" items for ARC to include in RI, let them move on without revising document.

- o Bedrock. Incorporate comments into RI report.

- o RI Report. B&C to complete, ARC contractor transition to be completed by December 31 (no more BC involvement thereafter), Greg Davis retiring but will have access to him through Papadopoulos, assume Greg Davis will assist through RI completion but not FS.

ARC awaiting instruction re: background (above) although not critical path item for RI, plume stability (FS-related).

- **Feasibility Study** – ARC to include restoration alternative, don't revise memo or respond to comments, ARC will provide brief position statement on issues of disagreement. ARC awaiting EPA direction on RAOs and tech screening for next tech memos, plume stability (which wells to include), will come after Sept 20 call. Dave, somewhat up in air until hear about ARC's proposal they are discussing now with NDEP.

Ginny said investors had proposed charcoal filtration (in the context of OU4a), chairman might want her to discuss it with us.

- **Risk Assessment** TM on CSM, ARC awaiting resolution on background before proceeding with workplan. Chris, big picture issues probably already decided through Acree/Ford intense involvement, probably could streamline Sophia's reviews. Best to get on Sophia's calendar early.
- **Bottled water** – EPA received ARC request to cease program, reviewing. Includes tribe and residences. ARC stopped bottled water for each resident upon connection to city water. Residents received settlement.

OU3. Process Area:

- **Remedial Investigation** –Jack: RI internal review, looking at early to mid-October delivery to agencies.
- **Risk Assessment** –
 - Tech Memo#3. ARC version dated 8/5. Chris, sent comments 9/27, emailed Jack about scheduling discussion mid-late October. Chris out 10/14-21.
 - HHRA workplan. Chris expects delivery in September(?), for review and comment, Hill review before its contract ends Sept 30, finalize maybe mid-November. Need to figure out how to address VLT, interim steps? Chris, anticipate a draft HRA this winter.
 - HHRA. Draft, late January?
- **FS/PP/ROD** - Complete RI and HHRA, de-prioritize FS.

OU4a. Evaporation Ponds:

- **Field Work** – Jack: field work complete, samples at lab, awaiting results, will discuss with lab how they fixed their problems, no ETA for OU4 data. Note that crust of dust suppressant was broken, they will reapply this fall. Dave: when have data tables can discuss and decide whether data collection is complete. Jeryl: data analysis and summary, interpretation. Dave: further

discussion on that, deliverable plan etc. Agree. Jack: they are giving much attention to addressing the lab situation and see that it doesn't repeat, sent us letter about lab.

OU7. Wabuska Drain:

- **Analytical Results** – Lab results received. CBI reviewed, noted high sulfate areas indicative of mine-impacts, low sulfate indicating no impacts, examined duplicate and split results. Awaiting BC memo providing analysis and discussing results, frame discussion, background and screening levels preliminary draft, ARC internal version expected mid-September, to agencies shortly thereafter. Scheduling team discussion late October. Hill on board for another year or two, until money runs out. Dante emailed Jack with agency availability for late October, awaiting reply.
- **YPT SAP/QAPP** – YPT QAPP/SAP, EPA QAMS reviewed, compared to Sitewide QAPP and ARC OU7 QAPP/SAP, confirmed consistency, approved. Dante provided to CBI; NDEP and BLM (?) for review as time permits. Jeryl will forward to Jack. Update on preparation for sampling.
- **WRPT QAPP** - WRPT retained McGinnis using GAP funding to do reservation-wide QAPP. Dave to work with Cynthia on increasing grant scope and funding.
- **Geothermal spill** – McGinnis doing white paper on the issues, evaporation increasing TDS concentrations in water. WRPT got sample results from samples at Julian well, near river. State still investigating. Dante compiled information provided, will share with Jack (?). Dante arranged for John Pinkler of water division to assist/advise, Dante provided all reports to him, he is reviewing and will contact Cynthia.

OU8. Arimetco:

- **Feasibility Study** – Jack: fine to have BC help in any way, call them if need information or them to pull something together. Holding finalization until HRA is revised. All else is complete. ARAR from BLM, CBI researched it, Dante asked CBI if it is in FS already. Jeryl, Greg thought RMP would not need to be ARAR (**could be referred to in FLPMA, and neither of these ARARs suggested would belong in the PP, but only in the ROD and FS**), can add into FS or continue discussing. CBI submitted final FS for review and approval. Any final comments would need to get to them at least a week before due date. Publish by 10/18.
- **Risk Assessment** - Sophia completed review on time, discussed comments with Dante and CBI, revisions underway. On schedule, publish by 10/24.
- **Proposed Plan – ROD planning** –

o **Proposed Plan.** Schedule, PP issue 11/28. HQ needs until end of September for review. Add hq comments to the next level of review, don't wait for them now. A comment pertaining to a BLM ARAR was raised (see FS above). CBI submitted figures, represent unique feature of each alternative, review in PP layout, can comment now too and discuss, involve Sarah. Text, Jeryl no comments from Greg/Jeff, will followup, **and submit clean Draft 3 today to Dante and DD**, Greg will review next version anyway. Glossary, acronym, figures (**what about inset text boxes that have been mentioned but not greatly discussed; will CBI look at those as well?**) to layout too. **Also, what happened to the 30-day HQ comment period?; their request for extension ended 9/30, but I forgot to ask you about that today; what are we supposed to do about that?**

Layout 10/3-14, when complete, send to Jeryl and he will distribute **to Dante, DD, Greg & Jeff**. Review 10/17-31, Dante/DaveD can compile respective agency comments and send to Jeryl. Jeryl will compile comments/edits and transmit to me for layout to edit. Jeryl and Chris both have Adobe Pro and could help edit. Jeryl, any speed-up of schedule to avoid public comment during Christmas would be much preferable. Dante can see if layout can do in 1 week vs. 2, and final review in 1 week vs. 2 would speed it up. Would need to finish ARs early too.

o **Admin Record.** AR due by 10/30. Dante/Jim completed review of all documents indexed as OU8. Dante reviewing other site documents that referenced Arimetco, need to review with Jim next week, Jim out 2 weeks thereafter. Dante needs to collect newer documents for indexing and inclusion in AR.

o **ROD.** Schedule, draft ROD 12/31. BLM funding process FY18 money requires draft ROD, package due around February. CBI team started ROD, Jeryl provided Word version of Rio Tinto ROD.

- **Enhanced Evaporation** – Taurus reported soil moisture sensors did not work. Jeryl: BC will provide additional information for SPS to assist with cost benefit analysis for EE, compare TDS to electrical conductivity. Jack: unsure if they will correlate well. SPS requested us to raise pond level in VLT pond, ARC did.
- **Water Balance model** – ARC, BC updating later this fall, could shed light on effects of EE.

Dante Rodriguez

Remedial Project Manager

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